

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 0:25-cr-60145-MD

UNITED STATES OF AMERICA

v.

**OLUSHOLA YUSUF and
SAMAN CALA GIMENEZ,**

Defendants.

/

NOTICE OF PENDING, RELATED OR SIMILAR ACTION

The United States of America, by and through its undersigned attorney and pursuant to Local Rule 3.8¹, hereby files this Notice of Pending, Related, and/or Similar Action.

The United States notifies the Court that there is a pending, related, and similar criminal action that was previously filed, involves a principal co-conspirator of the Defendant, and raises similar considerations before the Honorable Raag Singhal under the caption *United States v. Betscy Kurian*, Case No. 0:24-cr-60114-AHS. Additionally, there is a pending, related, and similar action that was filed and that involves overlapping facts and witnesses before the Honorable Rodney Smith, *United States v. Sergei Margulian, et. al*, Case No. 0:25-cr-60144-RS.

¹ The transfer of similar actions is addressed in the United States District Court for the Southern District of Florida's Internal Operating Procedures: "Whenever an action or proceeding is filed in the Court which involves subject matter which is a material part of the subject matter of another action or proceeding then pending before this Court, or for other reasons the disposition thereof would appear to entail the unnecessary duplication of judicial labor if heard by a different Judge, the Judges involved shall determine whether the higher-numbered action or proceeding shall be transferred to the Judge assigned to the lower-numbered action. (See IOP 2.06.00 Transfer of Higher-Numbered Cases)." IOP 2.15.00, Transfer of Similar Actions, available at <https://www.flsd.uscourts.gov/sites/flsd/files/1-2-24%20Internal%20Operating%20Procedures.pdf>, at 10.

Dated: June 26, 2025

Respectfully submitted,

LORINDA LARYEA, ACTING CHIEF
CRIMINAL DIVISION, FRAUD SECTION
U.S. DEPARTMENT OF JUSTICE

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/ Jacqueline Z. DerOvanesian
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CERTIFICATE OF SERVICE

I, Jacqueline DerOvanesian, hereby certify that on June 26, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/
Jacqueline Z. DerOvanesian